

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**DECLARATION OF BRIAN D. GLUECKSTEIN IN SUPPORT OF
OBJECTION OF THE FTX RECOVERY TRUST TO THE MOTION OF HYUNG
CHEOL LIM, AIMED, INC., BLOCORE PTE., LTD., JI WOONG CHOI, AND
MOSAIC CO. LTD. FOR AN ORDER, PURSUANT TO RULES 3001 AND
3020(D) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE AND
11 U.S.C. §§ 105(A) AND 1142(B), FOR LEAVE TO AMEND PROOF OF
CLAIM NO. 87144 TO CORRECT CLAIMANT'S NAME AND ADDRESS**

I, Brian D. Glueckstein, hereby declare under penalty of perjury:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing the FTX Recovery Trust² in the above-captioned proceedings. I submit this declaration in support of the *Objection of the FTX Recovery Trust to the Motion of Hyung Cheol Lim, Aimed, Inc., Blocore Pte., Ltd., Ji Woong Choi, and Mosaic Co. Ltd. for an Order, Pursuant to Rules 3001 and 3020(D) of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§ 105(a) and 1142(b), for Leave to Amend Proof of Claim*

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of post-effective date debtor entities in these chapter 11 cases, a complete list of the post-effective date debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Recovery Trust's claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established through the Debtors' confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404], which became effective on January 3, 2025 [D.I. 29127].

No. 87144 to Correct Claimant's Name and Address (“Objection”), filed concurrently herewith, to place before the Court certain documents referenced in the Objection.³

2. Attached hereto as Exhibit A is a true and correct copy of Claim No. 87144 relating to Customer Account No. 82284765, submitted on October 6, 2023.

3. Attached hereto as Exhibit B is a true and correct copy of Claim No. 50458 relating to Customer Account No. 1806799, submitted on September 11, 2023.

4. Attached hereto as Exhibit C is a true and correct copy of Claim No. 96401 relating to Customer Account No. 82284765, submitted on July 18, 2024.

5. Attached hereto as Exhibit D is a true and correct copy of Claim No. 96400 relating to Customer Account No. 1806799, submitted on July 18, 2024.

6. Attached hereto as Exhibit E is a true and correct copy of a letter from Arthur G.B. Thomas to John J. Ray III dated June 17, 2024, attaching an order from the Seoul Central District Court.

7. Attached hereto as Exhibit F is a true and correct copy of the summons and complaint, including its exhibits, filed in *Svalbard Holdings Ltd. v. Lemma Techs., Inc.*, No. 650457/2024 (N.Y. Sup. Ct.).

8. Attached hereto as Exhibit G is a true and correct copy of the *Memorandum of Law in Support of Plaintiff's Second Ex-Parte Motion for an Extension of the 120-day Period for Service Under N.Y. CPLR § 306-b* filed in *Svalbard Holdings Ltd. v. Lemma Techs., Inc.*, No. 650457/2024 (N.Y. Sup. Ct.).

Dated: February 14, 2025

/s/ Brian D. Glueckstein
Brian D. Glueckstein

³ Defined terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.